

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

100-15712 P 5:42

DEBORAH CHIN, On Behalf of Herself
and All Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10294-DPW

Hon. Douglas P. Woodlock

INFORMATION DYNAMICS, LLC, On
Behalf of Itself and All Others Similarly
Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10308-DPW

Hon. Douglas P. Woodlock

**MOTION OF PLAINTIFF SAVERIO
PUGLIESE FOR CONSOLIDATION AND FOR APPOINTMENT OF
LEAD PLAINTIFF, LEAD COUNSEL AND LIAISON COUNSEL**

<p>MICHELLE TREBITSCH, On Behalf of Herself and All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10307-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10309-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>SAMANTHA DEN, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10310-DPW</p> <p>Hon. Douglas P. Woodlock</p>

<p>RICHARD CURTIS, on Behalf of Himself and All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10314-MLW</p> <p>Hon. Mark L. Wolf</p>
<p>RONALD KASSOVER, on Behalf of Himself and All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10329-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>STEVE L. BAKER, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10333-DPW</p> <p>Hon. Douglas P. Woodlock</p>

<p>MICHAEL KAFFEE, on Behalf of Himself and All Others Similarly Situating,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10345-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>HAIMING HU, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10346-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>CHARLES STARBUCK, Individually and on Behalf of All Others Similarly Situating,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10362-DPW</p> <p>Hon. Douglas P. Woodlock</p>

<p>SAMUEL HO, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10363-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>JEFFREY C. RODRIGUES, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10364-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>ROBERT CONTE and MARK RESPLER, On Behalf of Themselves and all Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10382-DPW</p> <p>Hon. Douglas P. Woodlock</p>

<p>WHEATON ELECTRICAL SERVICES RETIREMENT 401K PROFIT SHARING, On Behalf of Itself and All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p>Defendants.</p>	<p>Civil Action No. 04-CV-10383-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>BRIAN CLARK, On Behalf of Himself and All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,</p> <p>Defendants.</p>	<p>Civil Action No. 04-CV-10454-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>SHEILA BROWNWELL, On Behalf of Herself and All Others Similarly Situating,</p> <p>Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p>Defendants.</p>	<p>Civil Action No. 04-CV-10597-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>SAVERIO PUGLIESE, On Behalf of Himself and All Others Similarly Situating,</p> <p>Plaintiff,</p> <p>v.</p>	<p>Civil Action No. 04-CV-10612-DPW</p> <p>Hon. Douglas P. Woodlock</p>

SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
	:	
	:	
	:	
Defendants.	:	
DAVID V. NOCITO, On Behalf of Himself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10623-DPW
	:	
	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
	:	
v.	:	
	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
	:	
	:	
Defendants.	:	

PLEASE TAKE NOTICE that pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), Plaintiff Saverio Pugliese ("Pugliese") will move this Court, at a time and place to be determined later, for an Order:

- (1) consolidating the above-captioned related actions filed on behalf of the purchasers of Sonus Networks, Inc. common stock;
- (2) appointing Pugliese as Lead Plaintiff in the above related actions under Section 21(D)(a)(3)(B) of the PSLRA; and
- (3) approving Pugliese's selection of Zwerling, Schachter & Zwerling, LLP as Lead Counsel and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel.

This motion is supported by the accompanying Memorandum of Law in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel, the Affidavit of Richard Speirs in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel together with the exhibits attached thereto, the [Proposed] Order Consolidating the Actions, Appointing Plaintiff and Saverio Pugliese Lead Plaintiff and Approving Lead Plaintiff's Choice of Lead Counsel and Liaison Counsel, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument, as may be presented to the Court.

Dated: Boston, MA
April 12, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO**

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